

STAFFORD BOROUGH COUNCIL LOCAL DEVELOPMENT FRAMEWORK

EXAMINATION OF THE PLAN FOR STAFFORD BOROUGH DEVELOPMENT PLAN DOCUMENT

SCHEDULE OF MATTERS & ISSUES FOR EXAMINATION

Deadline for submission of further statements:	11 October 2013
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Hearings commence:	23 October 2013
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Hearing sessions

Civic Suite
Civic Centre
Stafford Borough Council
Riverside
Stafford
Staffordshire
ST16 3AQ

Inspector:

Stephen J Pratt BA(Hons) MRTPI

Programme Officer:

Sean Roberts
1st Floor, Civic Centre
Stafford Borough Council
Riverside
Stafford ST16 3AQ

Telephone no: 01785-619522
e-mail: Programmeofficer@staffordbc.gov.uk

Web-site:

<http://www.staffordbc.gov.uk/examination>

**STAFFORD BOROUGH COUNCIL
EXAMINATION OF THE PLAN FOR STAFFORD BOROUGH**

SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION

1. The Inspector has prepared this Schedule of Matters & Issues for Examination to focus the discussion at the hearing sessions of the Examination of the **Plan for Stafford Borough** (the "Plan"). It is based on the Planning Inspectorate's Procedure Guidance¹, and has regard to the representations made to the Publication version of the Plan, the supporting evidence and the guidance in the National Planning Policy Framework² (NPPF). **All participants should be aware of this published guidance**, along with the Inspector's Guidance Notes, circulated previously³.
2. This Schedule lists the main topics and issues to be addressed during the examination, setting out several questions on which the Inspector invites responses from participants. The Council is requested to respond on all matters, issues and questions listed, referring to information in the Submission Documents & Supporting Evidence (limited to 3000 words per Matter/Policy). If other participants wish to submit further statements (limited to 3000 words), they should only respond on topics/issues relevant to points made in their original representation(s), without raising new issues. **Statements should address relevant Matters & Issues**, rather than repeating points made in the original representations or making new points, and **should not introduce new evidence or material** unless it is essential to understand the cases. Participants may refer to information in earlier representations, but the Inspector only has copies of the representations made on the Publication version of the Plan. Further statements are not needed unless they relate to the legal requirements or soundness of the plan, as set out in this Schedule of Matters & Issues. Participants can rely on their original representation(s), but should not extend the scope of the original points made. The Examination process does not provide the opportunity to make further submissions or present new evidence not based on the original representations or to submit new points and material.
3. All further statements should be received by the Programme Officer **no later than Friday 11 October 2013**. **All material that participants wish to put before the Inspector or refer to at the hearings should be submitted by this deadline**. The Inspector is unlikely to accept further/new information/evidence once the hearing sessions commence, since this could disrupt the progress of the hearings and disadvantage participants.
4. Detailed agendas for the hearing sessions will be issued shortly before they commence, based on the Matters & Issues for Examination and the responses received. However, the Inspector is unlikely to introduce new issues or questions that do not arise from the topics and issues identified. Participants should let the Programme Officer know as soon as possible whether they wish to attend a particular hearing session. Although anyone can attend the public hearings, only those listed in the programme can participate in the relevant hearing session. **Normally, only those who seek some change to the plan are entitled to participate in the hearing sessions**, but others may be invited if they can contribute positively to the discussion or assist the Inspector.
5. The Examination will focus on the requirements of soundness set out in the NPPF (¶ 182). The starting point is the assumption that the Council has submitted what it considers is a sound plan. **Other participants are expected to explain which aspect of the plan is unsound, why it is unsound and how it should be altered, with detailed wording and clear evidence to support any changes.**

¹ *Local Development Frameworks – Examining Development Plan Documents: Procedure Guidance* [PINS; August 2009]

² National Planning Policy Framework [DCLG; March 2012]

³ Inspector's Guidance Notes for Participants [Examination Library Document J2; 23 August 2013]

6. As well as complying with the legal requirements, the Plan has to be positively prepared, justified, effective and consistent with national policy⁴. **"Positively prepared"** means the plan should be based on a strategy which meets the objectively assessed development and infrastructure requirements, including unmet requirements from surrounding areas where it is reasonable and consistent with achieving sustainable development; **"Justified"** means the plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence; **"Effective"** means the plan should be deliverable and based on effective joint working on cross-boundary strategic priorities; *To be consistent with national policy*, the plan should enable the delivery of sustainable development in line with policies in the NPPF. The Examination will focus on these key requirements of soundness. The Plan should also set out **what** and **how much** development is proposed, and **where, when** and **how** it will be provided, along with the necessary justification.
7. This is a complete Schedule of Matters and Issues for the Examination. Not all matters and issues will be discussed at the hearing sessions; this will partly depend on who wishes to participate at the hearings, details of which will be set out in the Hearings Programme. At present, it is likely that the main matters and issues to be discussed at the hearings will cover the **Duty to Co-operate; Development Strategy, including the overall level and distribution of housing and employment development; the Strategy for Stafford Town and Stone Town, including the location of development and Strategic Development Locations; Economy, including specific employment sites; and Other Policies, including Transport, Communities, Environment, Infrastructure, delivery and viability.**
8. This Schedule of Matters and Issues is based on current national planning policies (as at 4 September 2013). If further announcements are made about national, regional or local planning policy or the scope and nature of the examination, the agenda and content of the Matters and Issues for Examination may need to be amended. Participants should keep up-to-date with the latest situation by checking the Council's Examination website⁵.
9. Participants should be aware that the scope for making substantial or fundamental changes to the Plan after it has been submitted to the Secretary of State is limited, particularly where they have implications for the sustainability appraisal, the consultation processes already undertaken, and the underlying strategy. **The Inspector will not be able to make a substantive change to the Plan unless it relates to an issue that has been subject to proper procedures of community involvement and sustainability appraisal.** In the absence of clear evidence that such procedures have been carried out, the Inspector can only give limited consideration to such representations⁶. All evidence and material relevant to the representations should have been submitted at the consultation stage. Participants should note that the hearing sessions are intended to discuss issues raised about the soundness and legal compliance of the plan, rather than discussing individual representations or giving an opportunity for a full presentation of participants' cases. Participants promoting additional/alternative development sites should first demonstrate why such sites are needed in the context of the soundness of the strategy and the sites already proposed in the Plan.
10. In carrying out this Examination, the Inspector will aim to work in a proactive, pragmatic and consensual manner with the Council and other participants, in order to deliver a positive outcome. He will expect all participants to act in a similarly co-operative manner, adopting a positive approach to the plan-making process. Any queries that participants wish to raise should be addressed to the Programme Officer.

⁴ National Planning Policy Framework (¶ 182) [DCLG; March 2012]

⁵ <http://www.staffordbc.gov.uk/examination>

⁶ *Local Development Frameworks – Examining Development Plan Documents: Procedure Guidance* (Annex; p.38; ¶ 5) [Planning Inspectorate: August 2009]

THE PLAN FOR STAFFORD BOROUGH - EXAMINATION
SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION

1. LEGAL REQUIREMENTS & PROCEDURAL MATTERS

Key issues:

- 1.1 Has the Plan had regard to and been prepared in accordance with the current **Local Development Scheme, Statement of Community Involvement, Sustainable Community Strategy, Local Development Regulations** and **national planning policy**⁷, including the National Planning Policy Framework (NPPF)?
- 1.2 Has the Plan been subject to **Sustainability Appraisal**, including a final report on the published plan; and is it clear how the Sustainability Appraisal influenced the final plan and dealt with mitigation measures?
- 1.3 Are there any implications of the recent revocation of the **West Midlands Regional Strategy** for the Plan, both in terms of its strategy, policies and text?
- 1.4 Has the Plan been prepared in accordance with the **Duty to Co-operate** and has the Council fully discharged its duty to co-operate, particularly with regard to strategic matters, including housing requirements and other cross-boundary issues^{8/9}, particularly in terms of:
- a. Has the Council co-operated constructively, actively and on an on-going basis with neighbouring local planning authorities and other prescribed bodies with regard to strategic matters, including:
 - i. Local authorities in **Staffordshire and the West Midlands** conurbation with regard to housing requirements within the appropriate housing market area and wider cross-boundary future housing requirements, including any unmet requirements from surrounding areas;
 - ii. **Stoke-on-Trent CC & Newcastle-under-Lyme BC** with regard to the potential impact of proposed development in Stafford Borough on urban regeneration in the North Staffordshire conurbation;
 - iii. **South Staffordshire DC** with regard to the issue of Regional Logistics Sites;
 - iv. **Natural England and other local authorities in Staffordshire and the Black Country** with regard to the Cannock Chase Special Area of Conservation, including mitigation measures and Appropriate Assessment under the Habitats Directive/Regulations.
- 1.5 What is the latest position on any **Further Proposed Changes** that the Council wishes to make to the submitted Plan, including the arrangements for any further public consultation and/or sustainability appraisal?
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2. SPATIAL VISION & KEY OBJECTIVES

Key issue:

Are the Vision for Stafford Borough and the key objectives justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the plan, and do they provide a sound basis for the development strategy and strategic policies in the Plan?

2.1 Spatial Vision:

- a. Does the Plan set out an appropriate, justified, effective and locally distinctive Spatial Vision for the future development strategy of Stafford Borough over the plan period in a clear and positive manner, providing a sound basis for the strategic policies in the Plan and giving sufficient strategic direction for the Borough to 2031?

2.2 Key Objectives:

- a. Does the Plan contain clear, specific, consistent and locally distinctive objectives, which will help to deliver the Spatial Vision in Stafford, Stone and the areas outside?

⁷ Detailed aspects of consistency with national policy, including the National Planning Policy Framework [DCLG; March 2012], will be dealt with under later topics and issues

⁸ Localism Act 2011 [S.110] & Planning & Compulsory Purchase Act 2004 (as amended) [S.33A]

⁹ This section only relates to the legal requirements related to the Duty to Co-operate; detailed aspects of cross-boundary/strategic issues relating to housing, employment and other matters will be dealt with later

3. DEVELOPMENT STRATEGY (Spatial Principles SP1-SP7)

Key issue:

Is the Development Strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?

3.1 Spatial Principle 1:

- a. Does SP1 properly reflect the presumption in favour of sustainable development set out in the NPPF?

3.2 Spatial Principle 2:

- a. How has the Council undertaken an objective assessment of housing requirements for the relevant housing market area, and does the Plan fully meet the objectively assessed needs for market and affordable housing within Stafford Borough, along with any unmet housing requirements from neighbouring authorities:
 - i. What is the basis, justification and methodology for the level of proposed housing provision (500 dwellings/year), having regard to the supporting evidence (including the SHMA & SHLAA), recent population/household projections (including the 2011-based interim household projections) and Census results, and guidance in the NPPF (¶ 14, 17, 47-55; 159);
 - ii. What is the current and future 5, 10 & 15-year housing land supply position, in terms of existing commitments, future proposed provision, allowance for windfalls, and provision identified in the latest SHLAA; and how will the proposed housing provision be effectively delivered in terms of Strategic Development Locations and other allocations?
 - iii. How does the Plan address the need for a 5/20% buffer to 5-year housing land supply, as required by the NPPF (¶ 47) to significantly boost housing supply, and address past shortfalls in provision of housing?
 - iv. Have any alternative levels of housing development been considered, having regard to any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Stafford Borough?
- b. The Plan proposes an annual target of about 8ha of employment land within Stafford Borough (160ha over the plan period):
 - i. What is the basis for this level of employment land provision, including the various economic scenarios, and how will this provision be delivered effectively in terms of existing commitments and future allocations?
 - ii. Would the proposed level of new employment land result in a significant over-provision of land within the Borough, which could adversely affect the regeneration and economic prospects of nearby towns in the North Staffordshire conurbation?
 - iii. Has the Plan properly considered the balance between new housing and employment development, and has the evidence base addressed the quantitative and qualitative elements of employment land provision?
- c. Does SP2 effectively address cross-boundary housing and employment issues, including the relationship with Stoke-on-Trent/Newcastle-under-Lyme and other authorities in north Staffordshire; South Staffordshire, Cannock Chase, Birmingham and the West Midlands conurbation; other adjoining districts and rural areas, in line with national policy (NPPF; ¶ 178-181); and has it taken account of the strategies, plans, priorities and projects of adjoining local authorities and other bodies/agencies?

3.3 Spatial Principles 3, 4 & 5:

- a. Does SP3 establish an appropriate, effective, sustainable and soundly based settlement hierarchy, reflecting the existing and future role of settlements, including the County Town of Stafford, Market town of Stone and Key Service Villages, and is this approach fully justified with relevant and up-to-date evidence?
- b. Does SP4 establish an appropriate, effective, justified, sustainable and soundly based distribution of housing growth within Stafford Borough, including the target levels of housing and balance between Stafford (72%; 7,200), Stone (8%; 800), Key Service Villages (12%; 1,200) and other areas (8%; 800)? Is the approach to a moratorium period realistic, appropriate, effective, fully justified and soundly based?
- c. Does SP5 establish an appropriate, effective, justified, sustainable and soundly based distribution of employment growth, including the proposed target levels of employment land development and the balance between Stafford (56%; 90ha), Stone (12%; 20ha) and other areas (32%; 50ha)?

- 3.4 **Spatial Principle 6:**
- a. How will SP6 help to achieve rural sustainability, including the re-use of redundant buildings, new employment, public transport and housing mix?
- 3.5 **Spatial Principle 7:**
- a. SP7 indicates that one of the key elements to deliver the proposed scale and distribution of housing and employment development is the establishment of Settlement Boundaries for each of the settlements in the Sustainable Settlement Hierarchy, either in this Plan (for Stafford and Stone) or in neighbourhood plans or the Site Allocations & Policies Document (for Key Service Villages). Is this an appropriate, effective, justified and soundly based way of delivering the scale and distribution of proposed development?
 - b. Are the criteria for establishing Settlement Boundaries appropriate, justified, effective, soundly based and consistent with national policy?
 - c. Are the criteria set out for considering development in other locations appropriate, justified, effective, soundly based and consistent with Policies E2, E5 & C5 and national policy, including the balance between brownfield and greenfield sites?
- 3.6 **General:**
- a. Is the Development Strategy sufficiently flexible to respond to a variety of unexpected or changing circumstances in the future, and when will the Plan be reviewed?
 - b. Does the Development Strategy give sufficient strategic guidance and spatial direction about the scale, location, timing and implementation of new development, in order to guide subsequent Local Plan Documents and development decisions?
 - c. Various alternative strategies were considered during the preparation of the Plan. Is the proposed Development Strategy the most appropriate, effective and sustainable strategy for Stafford Borough, having considered reasonable alternatives?
 - d. Does the Key Diagram properly illustrate the main elements of the Development Strategy, including the future pattern of development (including proposed housing and economic development), the settlement hierarchy and role of centres?
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4. STAFFORD TOWN (Policies STAFFORD 1 – 4)

Key issue:

Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?

4.1 POLICY STAFFORD 1 – STAFFORD TOWN:

Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including:

- a. Housing:
 - i. The overall amount, range, type, delivery and accessibility of new housing, including provision at the Strategic Development Locations and other locations, and the impact on the surrounding landscape;
 - ii. The amount, location, timing and delivery of the proposed additional provision to meet the housing requirements of the Ministry of Defence (MOD).
- b. Employment:
 - i. The overall amount, type, location and delivery of new employment development;
 - ii. Proposals for the Science & Technology Park at Beaconside;
 - iii. Proposals for further development at the MOD land as a military base;
 - iv. New employment land allocations at North of Stafford and East of Stafford;
 - v. The approach to safeguarding existing employment land.
- c. Stafford Town Centre:
 - i. Strengthening the role, viability and vitality of the town centre, including the extent of the Primary Shopping Area and primary/secondary frontages;
 - ii. Provision of additional comparison (34,000 sq m) and convenience (2,000 sq m) retail floorspace, and whether this is supported by the Retail Capacity Studies;
 - iii. The provision of new office and commercial development (45,000 sq m);
 - iv. Proposals for mixed-use development at Kingsmead and Riverside.
- d. Infrastructure:
 - i. Is the scale, nature and timing of proposed infrastructure necessary, justified, deliverable, viable and appropriate, including the Western, Northern and Eastern Access Improvement Schemes, water, sewerage and other utilities, public transport, education, cycling/walking, green infrastructure, waste facilities, leisure, recreation and open space?
- e. Have other potential Strategic Development Locations been properly assessed, including Clarkes Farm.

4.2 POLICY STAFFORD 2 – NORTH OF STAFFORD

- a. Is the Strategic Development Location at North of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:
 - i. The overall amount, mix, location, deliverability, viability and timing of new housing development (3,100 houses), including affordable housing;
 - ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (36ha);
 - iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Northern Access Improvement Scheme), drainage and flood management works, utility and telecommunication services, education and health facilities, and mitigation of the impact of development on Cannock Chase SAC (including SANGS);
 - iv. The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health and other facilities, integration with the rest of Stafford, and provision of on-site renewable/low carbon energy solutions;
 - v. Impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services;
- b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?
- c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and the associated infrastructure?

4.3 **POLICY STAFFORD 3 – WEST OF STAFFORD**

- a. Is the Strategic Development Location at West of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:
 - i. The overall amount, mix, location, deliverability, viability and timing of new housing development (2,200 houses), including affordable housing;
 - ii. The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health and other facilities, and provision of small-scale employment areas (5ha) and on-site renewable/low carbon energy solutions;
 - iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements, (including Western Access Improvement Scheme) drainage works, utility and telecommunication services, education facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), open space and green infrastructure;
 - iv. Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, including the setting of Stafford Castle and St Mary’s Church, nature conservation, flooding, and existing services;
- b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing and other development in terms of infrastructure requirements and impact of the proposed development?
- c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and associated infrastructure?

4.4 **POLICY STAFFORD 4 – EAST OF STAFFORD**

- a. Is the Strategic Development Location at East of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:
 - i. The overall amount, mix, location, deliverability, viability and timing of new housing development (600 houses), including affordable housing;
 - ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (20ha);
 - iii. The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health, cemetery, other facilities and on-site renewable/low carbon energy solutions;
 - iv. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Eastern Access Improvement Scheme, Eastern Distributor Road and other road improvements), drainage works, utility services, education and health facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and green infrastructure;
 - v. Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, nature conservation and existing services;
 - b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?
 - c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and associated infrastructure; or should other additional/alternative sites be allocated to ensure the delivery of the proposed development?
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5. STONE TOWN (Policies STONE 1 – 2)

Key issue:

Is the development strategy for Stone Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?

5.1 POLICY STONE 1 – STONE TOWN:

Is the development strategy for Stone Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including:

- a. Housing:
 - i. The overall amount, range, type, deliverability and accessibility of proposed new housing development, including at the proposed Strategic Development Location;
- b. Employment:
 - i. The overall amount, type, location and deliverability of new employment development;
 - ii. The approach to providing opportunities for new enterprises and businesses by allocating new employment sites, including at the proposed Strategic Development Location, and the approach to safeguarding existing employment land.
- c. Stone Town Centre:
 - i. Strengthening the role of the town centre as a market town, including enhancing the primary shopping areas and providing additional convenience (1,400 sq m) and comparison (2,200 sq m) retail floorspace, and whether this is supported by the Retail Capacity Studies;
 - ii. Increasing the provision of new office and commercial development;
 - iii. Justification and details of the proposed mixed-use development at Westbridge Park, and its likely impact on recreational/green-space assets, canal and flooding.
- d. Infrastructure:
 - i. Is the scale, nature and timing of proposed transport infrastructure necessary, justified, deliverable, viable and appropriate, including improving public transport accessibility, reducing road congestion, extending cycling/walking paths, improving access to the railway station and ensuring adequate provision for taxis;
 - ii. Is the scale, nature and timing of other proposed infrastructure necessary, justified, deliverable, viable and appropriate, including new allotments, green infrastructure, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and leisure, recreation and open space facilities?
- e. Have other potential Strategic Development Locations been properly assessed?

5.2 POLICY STONE 2 – WEST & SOUTH OF STONE

- a. Is the Strategic Development Location at West & South of Stone appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based, including:
 - i. The overall amount, mix, location, deliverability, viability and timing of new housing development (500 houses), including affordable housing;
 - ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (18ha);
 - iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including local highway and utilities improvements, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and education facilities;
 - iv. The design of the proposed development, including the impact on the surrounding area and landscape and the provision of on-site renewable/low carbon energy solutions;
- b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?
- c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and the associated infrastructure?
- d. Should the proposed development be delivered after 2021, in order to provide an opportunity to deliver brownfield development as part of the urban regeneration of the North Staffordshire conurbation?

6. ECONOMY (Policies E1-E8)

Key issue:

Does the Plan set out a clear economic strategy which positively and proactively encourages sustainable economic growth, and are the policies for the local and rural economy, tourism and canals, town, local and other centres soundly based, effective and appropriate for Stafford Borough, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

6.1 LOCAL ECONOMY (Policy E1)

- a. How will the proposed measures to sustain the local economy effectively support the location, diversity and intensity of new economic development and support sustainable economic growth within Stafford Borough, in line with national planning policy?
- b. Does the policy provide an appropriate balance between economic development in the urban and rural areas and between brownfield and greenfield sites?

6.2 SUSTAINABLE RURAL DEVELOPMENT, INCLUDING DEVELOPMENT WITHIN RECOGNISED INDUSTRIAL ESTATES AND MAJOR DEVELOPED SITES IN THE GREEN BELT (Policies E2-E5)

- a. Policy E2:
 - i. How will the proposed measures effectively support the sustainability and economic growth of rural areas, in line with national planning policy?
 - ii. Are the criteria for development in rural areas, including re-use of rural buildings, appropriate, effective, justified, soundly based and consistent with national policy?
 - iii. Does the policy provide an appropriate balance between brownfield and greenfield development and between economic and residential uses?
- b. Policies E3 & E4:
 - i. Is the approach to economic development and the range of uses at the designated industrial estates within the rural area appropriate, effective, justified, soundly based and consistent with national policy?
 - ii. Is the proposal to deliver 6ha of new employment land at **Ladfordfields** Industrial Estate appropriate, effective, justified and soundly based, including flooding and surface water, nature conservation, landscape, utilities and accessibility issues and the need for local infrastructure improvements?
 - iii. Is the proposal to deliver 6ha of new employment land at **Raleigh Hall** Industrial Estate appropriate, effective, justified and soundly based, including flooding and surface water, nature conservation, landscape, utilities and accessibility issues, the need for local infrastructure improvements and the impact on the local community?
- c. Policy E5:
 - i. Is the approach to Major Developed Sites in the Green Belt, including **Hadleigh Park, Moorfields Industrial Estate** and former **Meaford Power Station**, appropriate, justified, effective, soundly based and consistent with national policy?
 - ii. Is the policy for the Green Belt, including existing settlements and the approach to identifying Safeguarded Land, appropriate, justified, effective, soundly based and consistent with national policy?

6.3 TOURISM (Policy E6)

- a. How will Policy E6 effectively promote and enhance opportunities for tourism and new visitor accommodation that benefit the local economy and community in appropriate locations in an effective and sustainable way, consistent with national policy?
- b. Should the Plan include a site-specific policy to support restoration and regeneration with new development at Trentham Estate/Gardens?

6.4 CANAL FACILITIES & NEW MARINAS (Policy E7)

- a. Does Policy E7 provide an appropriate, effective, justified and soundly based framework for considering development proposals alongside canals?
- b. Is the proposed restriction on permanent moorings in the countryside unduly restrictive?

6.5 TOWN, LOCAL AND OTHER CENTRES (Policy E8)

- a. Does Policy E8 provide an appropriate, effective and soundly based framework for maintaining and enhancing the roles, functions, vitality and viability of Stafford Town Centre, Stone Town Centre, Eccleshall Local Centre and other Village and Neighbourhood Shops, which is justified with evidence (Retail and Town Centres Studies and Town Centre Capacity Assessments) and consistent with Policy Stafford 1, Policy Stone 1 and national policy?
 - b. Are the measures to increase the use of town centres effective, including the range of uses and the criteria for permitting non-retail uses?
 - c. Is the approach to edge and out-of-centre uses, and to resisting the loss of existing facilities, unduly restrictive, effective, justified with evidence, soundly based and in line with national policy?
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7. TRANSPORT (Policies T1-T2)

Key issue:

Does the Plan set out a clear strategy to promote sustainable transportation and manage the demand for travel, which is justified, effective, soundly based, appropriate for Stafford Borough and consistent with national policy?

7.1 TRANSPORT (Policy T1)

- a. Do the proposed measures effectively achieve a sustainable transport system across Stafford Borough, including reducing the need to travel by private car and requiring new development to produce Transport Assessments and Travel Plans;
- b. Should the Plan refer to the High Speed Rail HS2 proposals?

7.2 PARKING & MANOEUVRING FACILITIES (Policy T2)

- a. What is the justification for including a detailed policy and appendix on parking and manoeuvring standards, and is this approach consistent with national policy?
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8. COMMUNITIES (Policies C1-C7)

Key issue:

Does the Plan provide an appropriate, effective and soundly based framework for supporting strong, vibrant and healthy communities, including the provision of a mix of dwellings, including affordable housing, special needs accommodation and provision for gypsies and travellers, clear and effective locational criteria for new and replacement dwellings, and provision of open space, sport and recreational facilities, which is fully justified with evidence and consistent with national policy?

8.1 DWELLING TYPES & SIZES (Policy C1)

- a. Is the approach to requiring new housing development to provide a mix of dwelling types, tenures and sizes, including a proportion of affordable housing, appropriate, justified with evidence, effective, soundly based and consistent with national policy?
- b. Should the range of dwelling types and sizes reflect existing household/dwelling sizes and current waiting lists, or should it reflect market demand, need and viability?

8.2 AFFORDABLE HOUSING (Policy C2)

- a. Is the approach to providing affordable housing soundly based, justified with evidence, effective, deliverable, viable, appropriate for Stafford Borough and consistent with national policy, particularly in terms of:
 - i. The latest Strategic Housing Market Assessment indicates a need for 210 new affordable homes/year. How will this amount of affordable housing be delivered, including the size, type and tenure of affordable housing and the means of meeting the objectively assessed need for affordable housing?
 - ii. Policy C2 sets a target for affordable housing of either 30/40%, with a site size threshold of 0.1/0.4.ha (3/12 dwellings). Are these thresholds and targets, along with the approach to seeking developer contributions to facilitate the provision of affordable housing either on-site or off-site, fully justified and supported by an informed robust assessment of economic viability?

8.3 SPECIALIST HOUSING (Policy C3)

- a. How will the measures proposed in Policy C3 effectively meet the anticipated need for extra-care accommodation in Stafford Borough, including the locational requirements and access to existing services, facilities and public transport, and is the need for such provision justified with evidence?

- 8.4 **RESIDENTIAL PROPOSALS OUTSIDE THE SETTLEMENT HIERARCHY (Policy C5)**
- a. Are the locational and other criteria for new development, replacement dwellings and extensions/alterations to existing dwellings outside settlement boundaries appropriate, effective, justified, soundly based and consistent with the spatial principles of the development strategy and national policy?
 - b. Is the approach to residential development outside settlement boundaries unduly restrictive, including the need for a Parish-based Local Housing Needs Assessment and the approach to Rural Exception Sites?
- 8.5 **PROVISION FOR GYPSIES AND TRAVELLERS (Policy C6)**
- a. How will Policy C6 make adequate provision for gypsy and traveller accommodation, having regard to the latest national policy on Traveller Sites¹⁰, particularly in terms of:
 - i. Setting pitch/plot targets for gypsies, travellers and travelling showpeople which meet the likely permanent and transit site accommodation needs of travellers in the Borough, supported by evidence (including the implications of the latest GTAA) and in collaboration with neighbouring local planning authorities;
 - ii. Identifying a supply of specific deliverable sites sufficient to provide 5-years of sites against locally set targets, along with a supply of specific, deliverable sites or broad locations for years 6-15 of the plan period, and effectively ensuring such provision is made;
 - iii. Setting out clear, specific and relevant criteria to guide site allocations and decisions on planning applications where there is an identified unmet need;
 - iv. Meeting the other policy requirements set out in the latest national policy on Traveller Sites (¶ 7-19), including the recent Ministerial statement¹¹.
- 8.6 **OPEN SPACE, SPORT & RECREATION (Policy C7)**
- a. Does Policy C7 set out an appropriate, effective and soundly based framework for providing open space, sport and recreation facilities, which is justified with robust and up-to-date evidence, reflecting the views of Sport England and consistent with national policy?
 - b. Does the policy require increased standards of open space, in addition to any provision needed to mitigate any adverse impact of development on the integrity of the Cannock Chase SAC?
 - c. Should the policy indicate specific open space, sports and recreation facilities to be provided at the Strategic Development Locations?
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¹⁰ *Planning Policy for Traveller Sites* [DCLG; March 2012]

¹¹ Written Ministerial Statement on Planning & Travellers [DCLG; 1 July 2013]

9. ENVIRONMENT (Policies N1-N9)

Key issue:

Does the Plan provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality environment within Stafford Borough, including design, climate change, renewable energy and the natural and historic environment, including landscape and sites of nature conservation importance, particularly Cannock Chase SAC & AONB, which is fully justified with evidence and consistent with national policy?

9.1 DESIGN, CLIMATE CHANGE AND LOW CARBON SOURCES & RENEWABLE ENERGY (Policies N1-N3)

- a. How will the principles set out in Policy N1 effectively secure enhancements in design quality in new developments, including use, form, space and movement?
- b. How will the criteria and requirements set out in Policy N2 effectively facilitate a reduction in the consumption of natural resources, improve environmental quality and mitigate the impact of climate change?
- c. Are the requirements in Policies N1 & N2 to comply with specific standards and codes unduly onerous and unnecessary, particularly in view of the Government's recent consultations on the review of housing standards and zero carbon homes¹²?
- d. How will the measures set out in Policy N3 effectively increase the use and provision of renewable and low-carbon energy sources, consistent with the latest national planning practice guidance for renewable and low carbon energy¹³?
- e. Is the approach to on-shore wind energy in Policy N3 unduly restrictive, and does it adequately address the impact of such development on the landscape, rural economy, heritage assets and local/visual amenity, including the cumulative landscape and visual impact, in line with the latest Written Ministerial Statement about Local Planning and on-shore wind¹⁴ and any subsequent policy guidance?

9.2 NATURAL ENVIRONMENT & GREEN INFRASTRUCTURE (Policy N4)

- a. How will the measures set out in Policy N4 effectively protect, enhance and improve the Borough's natural environment, green infrastructure, biodiversity and landscape, reflecting the views of Natural England and the Environment Agency, and in line with national policy?

9.3 SITES OF EUROPEAN, NATIONAL & LOCAL NATURE CONSERVATION IMPORTANCE (Policy N5)

- a. Is the approach to protecting the integrity of sites of nature conservation importance appropriate, effective, justified, reflecting the views of Natural England and consistent with national policy, including the approach to European sites, air and water quality and development mitigation?
- b. Is the approach to undertaking Habitats Regulations Assessment under the Habitats Regulations/Directive soundly based, including the mitigation measures required, and has it been undertaken to the satisfaction of Natural England?

9.4 CANNOCK CHASE SPECIAL AREA OF CONSERVATION & AONB (Policies N6-N7)

- a. Does Policy N6 provide an appropriate, effective and soundly based framework for retaining and protecting the integrity of the Cannock Chase Special Area of Conservation, including mitigation measures, which is fully justified with evidence, positively prepared and consistent with national policy;
 - i. Does the approach reflect the approaches of other neighbouring planning authorities and the latest outcome of various HRA/SAC assessments, and are any further amendments needed to the policy to reflect the latest views of Natural England and the Cannock Chase SAC Partnership?
 - ii. Does Policy N6 give sufficient consideration to the proposed scale, nature and implementation of measures to mitigate the impact of new development, including SANGS, the extent of the SAC zone of influence, cross-boundary, air quality and viability issues, the relationship with green/environmental infrastructure, and the approach to developer contributions?
- b. Are the approach and principles set out in Policy N7 for conserving and enhancing the landscape and natural beauty of the Cannock Chase AONB appropriate, effective, justified and consistent with national policy?

¹² Housing Standards Review – Consultation [DCLG; August 2013]; and

Next steps to zero carbon homes – Allowable Solutions – Consultation [DCLG; August 2013]

¹³ Planning practice guidance for renewable and low carbon energy [DCLG; July 2013]

¹⁴ Written Ministerial Statement to Parliament on Local Planning and on-shore wind [DCLG; 6 June 2013]

9.5 **LANDSCAPE CHARACTER & HISTORIC ENVIRONMENT (Policies N8-N9)**

- a. Is the approach to protecting, conserving and enhancing the landscape and heritage assets appropriate, effective, justified and consistent with national policy?
 - b. Should the Plan include a specific policy covering new development at Trentham Estate and Gardens?
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10. INFRASTRUCTURE (Policy I1)

Key issue:

Does the Plan provide an appropriate, effective and soundly based framework for the delivery of infrastructure, including the costing, funding, viability, deliverability and timing of critical infrastructure required to deliver the strategy, which is fully justified with evidence and consistent with national policy?

10.1 **INFRASTRUCTURE DELIVERY POLICY (Policy I1)**

- a. Has the Plan fully considered the infrastructure implications of delivering the Development Strategy, including identifying the critical elements of physical, environmental and social infrastructure required, such as highways, public transport and accessibility, water, power and other utilities, flooding, drainage and flood risk mitigation, and health, education, social, community and other facilities, including costing, means of funding, viability, timescale and delivery, and reflecting the views of infrastructure and utility providers?
- b. Is the approach to securing developer contributions towards infrastructure appropriate, effective, justified with evidence, reasonable and consistent with national policy?
- c. Has the Plan fully considered the cumulative implications of developer contributions on the viability and deliverability of the Development Strategy, including the viability implications of the requirements of other policies in the Plan?
- d. Is the requirement to prepare Strategic Frameworks/masterplans for the Strategic Development Locations necessary, appropriate, effective and justified, including the delivery of infrastructure, viability and approach to developer contributions?

10.2 **MONITORING & REVIEW**

- a. Are the arrangements for monitoring the policies of the Plan adequate, effective, comprehensive and soundly based, including the Monitoring Framework, indicators, baseline information and targets/milestones used?
 - b. Are the delivery mechanisms, phasing and timescales for the implementation of the policies clearly identified, including critical elements of infrastructure required, including further technical work on highways, drainage, utilities and other critical infrastructure improvements?
 - c. Do the policies in the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, indicate when the plan will need to be reviewed, and identify the remedial actions to be taken if policies are not being successfully implemented?
 - d. Do the amendments to the Infrastructure schedules (Appx D) and Performance Indicators & Targets (Appx E) fully address the concerns of infrastructure providers and other bodies?
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11. OTHER MATTERS

11.1 **Other issues** - Other matters not yet specified
